

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	Chapter 13
KEVIN J. URBINE)	NO. 19-17901-pmm
Debtor)	
)	
SANTANDER BANK, N.A.)	MOTION FOR RELIEF
Movant)	43 Valley Road, Wyomissing, PA
vs.)	Hearing Date: May 13, 2025
)	Time: 10:00 a.m.
KEVIN J. URBINE and)	
VALERIE A. URBINE)	Courtroom: #4
Respondents)	

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**NOTICE OF MOTION, RESPONSE DEADLINE
AND IN-PERSON HEARING DATE**

SANTANDER BANK, N.A., ("Santander Bank"), has filed a Motion for Relief from the Automatic Stay with the Court seeking to terminate the automatic stay provisions with regard to Santander Bank, and to allow Santander Bank to proceed with state court remedies against your premises, 43 Valley Road, Wyomissing, Berks County, PA, including a Sheriff's Sale of the Premises.

1. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**
2. **If you do not want the court to grant the relief sought in the motion** or if you want the court to consider your views on the motion, then on or before **April 30, 2025 you or your attorney must file a response to the Motion** (see Instructions on next page).
3. A hearing on the motion is scheduled to be held before the Honorable Patricia M. Mayer on **May 13, 2025 at 10:00 a.m.** in 4th Floor Courtroom, United States Bankruptcy Court, Gateway Building, 201 Penn Street, Reading, PA 19601. Unless the Court orders otherwise, the hearing on this contested matter will be an evidentiary hearing. Requests for participation other than in person must be made pursuant to Local Bankruptcy Rule 9076-1.
4. **If you do not file a response to the Motion**, the court may cancel the hearing and enter an order granting the relief requested in the Motion.
5. You may contact the Bankruptcy Clerk's Office for Philadelphia cases at (215) 408-2800 and for Reading cases at (610) 208-5040 to find out whether the hearing has been canceled because no one filed a response.
6. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney whose name and address is listed on the next page of this Notice.

FILING INSTRUCTIONS

1. If you are required to file documents electronically by Local Bankruptcy Rule 5005-2, you must file your response electronically.
2. If you are not required to file electronically, you must file your response at
Bankruptcy Court Clerk's Office
The Gateway Building
201 Penn Street, Suite 103
Reading, PA 19601
3. If you mail your response to the Bankruptcy Clerk's Office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 on the previous page of this Notice.
4. On the same day that you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the movant's attorney:

Gross McGinley, LLP
c/o Kellie Rahl-Heffner, Esq.
33 S. 7th Street
Allentown, PA 18105
(P) 610-820-5450 (F) 610-820-6006
Krahl-heffner@grossmcginley.com

Date: April 14, 2025